

# BROWN & CONNERY, LLP

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February 17, 2023

**Via Electronic Filing**

Honorable Leda Dunn Wettre, U.S.M.J  
United States District Court  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

**Re: Deborah Gross-Quatrone v. Bonnie Mizdol, et al.**  
**Docket No.: 2:17-cv-13111-SDW-LDW**

Dear Judge Wettre:

We represent the Defendants in the above matter and submit this letter in follow up to the status conference held before Your Honor on February 14, 2023. Your Honor requested the parties submit a consent scheduling order with proposed deadlines for the remaining expert discovery in this case by today's date.

On February 15, 2023, we conferred with counsel for Plaintiff, Ralph Ferrara, regarding the consent order. He requested 60 days to serve Plaintiff's expert report, which we advised we would need to confer with our clients. He also stated he would be unable to identify Plaintiff's expert at this time. The parties agreed on 30 days following the service of Plaintiff's report for service of Defendants' report and 45 days following that for completion of expert depositions.

We informed Mr. Ferrara by email dated February 16, 2023 that we could not consent to 60 days for Plaintiff to serve her expert report at this stage and proposed 30 days for service of Plaintiff's report. Plaintiff rejected this and has maintained her request for 60 days further rejecting our suggested compromise of 45 days. Accordingly, the parties have been unable to reach an agreement as to the date for service of Plaintiff's report, though all other timeframes are agreed upon. Attached is a proposed form of Order that Defendants submit providing 45 days for Plaintiff's report, 30 days thereafter for Defendants, and 45 days thereafter for expert depositions.

Respectfully submitted,  
**BROWN & CONNERY, LLP**  
*s / Kathleen E. Dohn*  
Kathleen E. Dohn

cc: Ralph Ferrara, Esquire (*via electronic mail*)  
Kevin Kotch, Esquire (*via electronic mail*)

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William Tambussi, Esquire (*via electronic mail*)

Kayla Louis, Esquire (*via electronic mail*)

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

DEBORAH GROSS-QUATRONE,

Plaintiff,

vs.

BONNIE MIZDOL, DIANA MOSKAL,  
LAURA SIMOLDONI, and JOHN and  
JANE DOE 1-10,

Defendants.

Civil Action No. 2:17-cv-13111-SDW-LDW

**SCHEUDLING ORDER**

**THIS MATTER** having come before the Court by way of a February 14, 2023 status conference before the undersigned, and for good cause shown;

**IT IS** on this \_\_\_\_\_ day of \_\_\_\_\_, 2023, **ORDERED** that the Pretrial Scheduling Order entered November 5, 2021 (ECF No. 159), as subsequently amended, is hereby further amended as follows:

1. Plaintiff's expert report shall be served on or before April 3, 2023.
2. Defendants' expert report shall be served on or before May 3, 2023. Defendants' expert, Dr. Kenneth Weiss, shall have the opportunity to conduct any additional examination of the Plaintiff necessary following service of Plaintiff's expert report.
3. All expert depositions shall be conducted by June 19, 2023.

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**Honorable Leda Dunn Wettre  
United States Magistrate Judge**